

EXHIBIT B

MINDGEEK DEFENDANTS' 9.13.23 SCHEDULING PROPOSAL

From: Goddard, Mark B. on behalf of Goddard, Mark B. <MGoddard@TurnerPadget.com>
Sent: Wednesday, September 13, 2023 5:35 PM
To: Mikahlia Lawrence; Alan Belcher; Pamela Sandford; Thomas Barrow; Shellie Fischer; jhubert@rhp-law.com; jrahimi@rhp-law.com; kkennedy@rhp-law.com; jcluverius@nexsenpruet.com; gclose@nexsenpruet.com; wes@wesleyfew.com; cassy@wesleyfew.com; cooper.ellenberg@gmail.com; hellenberg@consumerprotection.net; Carter, J. Kenneth; Behnke, Lindsey M; Mayer, Marc; Bowman, Theresa; Steinberg, David; Melara, Suguey; vgurvits@bostonlawgroup.com; frank@bostonlawgroup.com; evan@cfwlegal.com; hmetcalfe@malawfirmsc.com
Cc: Liz Shepherd; Tyler Thompson; Jordan Stanton; Jeffrey Freeman; J Edward Bell; Joshua Salley; bbull@ncose.com; dpinter@ncoselaw.org; cprice@ncoselaw.org; pgentalala@ncoselaw.org; Casonya Ritchie
Subject: [EXTERNAL] RE: Does v Collins Murphy et al; DEPO OF COLLINS MURPHY 09-13-23
Attachments: 9.13 Draft Proposed New Schedule Chart(13944917.1).docx

Counsel,

It was a pleasure speaking with everyone this afternoon.

Attached is a chart with our new proposed deadlines. After further consideration of the discussions during the “Meet and Confer,” especially Limestone’s concerns as to potential additional merits based issues that may arise during the Plaintiffs’ depositions, we propose that ALL merits based discovery be completed by the March 1, 2023 discovery deadline (that Josh suggested). This deadline gives 5 ½ months for the parties to complete merits based discovery and gives us sufficient time for Defendants to also complete both 30(b)(6) and Plaintiffs’ depositions. Under this proposal, the only issues that will remain outstanding after the merits based discovery deadline will be damages, namely the completion of the IMEs, Plaintiffs’ damages expert disclosures, Defendants’ damages expert disclosures and any necessary discovery related to those expert disclosures.

Since we are unsure as to the timing of the Court’s ruling on the dispositive motions, and we all appear aligned on not wanting to potentially schedule and conduct IMEs while waiting for the Court to rule on dispositive matters, our initial thought is to request a status conference with the Court to set the remaining schedule after its ruling. However, if the Court desires an amended scheduling order that brings the case to a completion, our current proposal provides contingent dates for the damages expert phase based on the timing of the Court’s ruling on the dispositive motions.

As we discussed, we also propose keeping the Mediation deadline in December 2023.

Please review this proposal and give us your thoughts. If additional discussions are needed on this issue, please let us know and we can try to schedule a time tomorrow or Friday that works for everyone.

Mark B. Goddard
 Attorney
 PO Box 1473 | Columbia, SC 29202
 1901 Main Street, Suite 1700 | Columbia, SC 29201
 803-227-4334 | Fax 803-400-1542
 mgoddard@turnerpadget.com
[Bio](#) | [vCard](#) | [Location](#)



Event	Old Date	Proposed New Date
Pls.' Expert Disclosures	October 28, 2023	November 27, 2023
Defs. Expert Disclosures	November 28, 2023	January 6, 2024
Records Custodians Affidavits	November 30, 2023	January 9, 2023
Discovery Cut-Off for all discovery except that related solely to compensatory damages, including IMEs, Plaintiffs' and Defendants' Expert Disclosures, and discovery related to those Expert Disclosures	November 30, 2023	March 1, 2023
Deadline for filing of Dispositive Motions	December 30, 2023	March 15, 2024* *Briefing to conclude by May 3, 2024
Mediation	December 14, 2023	December 14, 2023
Hearing on Pending Dispositive Motions		May _____, 2024
Plaintiffs' Damages Expert Disclosures		Four months from decision on dispositive motions
Defs. Damages Expert Disclosures		Six months from decision on motions
Records Custodians Affidavits		Six months from decision on motions

Damages Discovery Cut-Off		Seven Months from decision on motions
Dispositive Motions Deadline		Eight months from decision on motions
Trial Not before		Nine Months from Decision on Motions